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December 15, 2020

VIA ECF

Hon. Sean H. Lane
United States Bankruptcy Court for the Southern District of New York
One Bowling Green
New York, NY 10004-1408

Re: *Molner v. Reed Smith LLP et al.*, Bankruptcy Case No. 14-11802 (SHL), Adversary
Proceeding No. 20-01313 (SHL)

Dear Judge Lane:

We represent Defendant Reed Smith LLP and the individual Reed Smith defendants in the above-referenced adversary proceeding. Pursuant to the Court's request at last week's pretrial conference, I write on behalf of all parties to jointly propose a briefing schedule and hearing date for Plaintiff's pending motion to abstain and/or remand this action to the New York State Supreme Court. Specifically, the parties request that Defendants' opposition briefs be due January 21, 2021; that Plaintiff's reply brief be due February 11, 2021; and that a hearing be held on March 10, 2021 at 2:00 p.m. Pursuant to Your Honor's Chambers' Rules, a paralegal from my office contacted Chambers in advance to secure the proposed hearing date and time and we have confirmed the parties' availability for that date.

We thank the Court for its consideration.

Sincerely,

/s/ David M. Feldman

David M. Feldman

Cc: All Counsel of Record (via ECF)